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October 22, 2024

The Honorable John M. Younge, Judge
U.S. District Court for the Eastern District of Pennsylvania
Room 15613 U.S. Courthouse
601 Market Street
Philadelphia, PA 19106

VIA ECF FILING and

VIA EMAIL: Chambers_Younge@paed.uscourts.gov

RE: American Environmental Enterprises, Inc. d/b/a TheSafetyHouse.Com v.
Manfred Sternberg et als
USDC, ED PA, Civil No. 2022-cv-00688 (JMY)

Dear Judge Younge:

We represent plaintiff American Environmental Enterprises, Inc. d/b/a THE SAFETY HOUSE.COM (“SAFETY HOUSE” or “TSH”) in the above-referenced case. By Order entered October 21, 2024 [ECF 204], Your Honor scheduled oral argument for November 14, 2024, at 11:30 a.m., on plaintiff TSH’s Motion to Compel Discovery and Deposition from defendants Manfred Sternberg, Esquire and Manfred Sternberg & Associates, PC (the “Sternberg Defendants”), and to Conduct De Benne Esse Trial Depositions of other victims [ECF 183] (the “Discovery Motion”). We write to respectfully request that the Court also schedule oral argument at the same time on plaintiff SAFETY HOUSE’s Motion under Rule 36(a)(6) of the Federal Rules [ECF 184], filed shortly after plaintiff’s Discovery Motion [ECF 183] that has been scheduled for oral argument, which Rule 36(a)(6) Motion seeks a Court determination deeming as admitted, Plaintiff’s Rule 36 Requests for Admission served on June 17, 2024, on the Sternberg Defendants.

In plaintiff’s Motion for Summary Judgment filed on September 30, 2024 [ECF 196], one of the several grounds upon which plaintiff SAFETY HOUSE seeks Summary Judgment against the Sternberg Defendants is because TSH claims that Sternberg Defendants failed to properly respond to almost all of the Requests for Admission (the “RFAs”) served on them, and thus that the RFAs should be deemed admitted under Rule 36 and applicable caselaw. If the Court grants plaintiff TSH’s Rule 36 Motion, that would constitute an additional ground upon which the Court could enter Summary Judgment in favor of plaintiff SAFETY HOUSE against the Sternberg Defendants. We respectfully submit that conducting oral argument on the Rule 36 Motion [ECF

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184] at the same time as the Discovery Motion [ECF 184], would facilitate the Court's determination of the pending Summary Judgment Motions.

Thank you for Your Honor's consideration.

Respectfully,

Gary Lightman
/s/ Gary Lightman
Gary P. Lightman

GPL:no

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